Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

VERIZON FLORIDA LLC,

Complainant,

Docket No. 15-73

File No. EB-15-MD-002

v.

Related to

FLORIDA POWER & LIGHT

Docket No. 14-216

COMPANY,

File No. EB-14-MD-003

Respondent.

RESPONDENT FLORIDA POWER & LIGHT COMPANY'S MOTION FOR LEAVE TO FILE

Respondent Florida Power & Light Company ("FPL"), by and through its attorneys, respectfully submits this Motion for Leave to File and requests that the Bureau grant FPL leave to submit the accompanying Motion to Hold Proceeding in Abeyance Pending Resolution of Complainant's Appeal of State Court Decision. As more fully discussed in the attached motion, Verizon's recent appeal of the Florida Court's grant of summary judgment again raises the Bureau's previously expressed concern with respect to a ruling on the merits being entered in this proceeding before the Florida court system is able to resolve the parties' dispute regarding the correct contractual rates. As such, good cause exists to permit the filing and consideration of the attached motion.

For the foregoing reasons, FPL respectfully requests that the Commission grant it leave to file the attached Motion to Hold Proceeding in Abeyance Pending Resolution of Complainant's Appeal of State Court Decision.

Respectfully submitted,

Maria Jose Moncada Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408 (561) 304-5795 Maria.Moncada@fpl.com

Alvin B. Davis Squire Patton Boggs (US) LLP 200 South Biscayne Boulevard Suite 300 Miami, FL 33131 (305) 577-2835 Alvin.Davis@squiresanders.com Charles A. Zdebski
Gerit F. Hull
Robert J. Gastner
Eckert Seamans Cherin & Mellott, LLC
1717 Pennsylvania Avenue, N.W., Suite 1200
Washington, D.C. 20006
(202) 659-6600
czdebski@eckertseamans.com
ghull@eckertseamans.com
rgastner@eckertseamans.com
Counsel to Florida Power & Light Company

CERTIFICATE OF SERVICE

I hereby certify that on December 8, 2015, I caused a copy of the foregoing Respondent's Motion for Leave to File to be served on the following by hand delivery, U.S. mail or electronic mail (as indicated):

Christopher S. Huther, Esq.
Claire J. Evans, Esq.
Wiley Rein LLP
1776 K Street, N.W.
Washington, DC 20006
chuther@wileyrein.com
(Via e-mail)
Attorneys for Verizon Florida LLC

William H. Johnson Katharine R. Saunders VERIZON 1320 N. Courthouse Road 9th Floor Arlington, VA 22201 katharine.saunders@verizon.com (Via e-mail)

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Room TW-A325
Washington, DC 20554
(Via Hand Delivery)

Kimberly D. Bose, Secretary Nathaniel J. Davis, Sr., Deputy Secretary Federal Energy Regulatory Commission 888 First Street, N.E. Washington, D.C. 20426 (Via Hand Delivery) Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399 (Via U.S. Mail)

Robert J. Gastner